

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

MADISON TITLE AGENCY, LLC	)	
	)	
Plaintiff,	)	CIVIL ACTION FILE
	)	NO. 1:20-cv-03674-SCJ
v.	)	
	)	
BANK OF AMERICA, N.A.	)	
	)	
Defendant.	)	
_____	)	

**BANK OF AMERICA, N.A.’S MOTION FOR SUMMARY JUDGMENT**

COMES NOW Defendant Bank of America, N.A. (“BANA” or “Defendant”), and files this Motion for Summary Judgment pursuant to Fed. R. Civ. P. 56 and N.D. Ga. LR 56.1 showing the Court that there is no genuine dispute as to any material fact and that Defendant is entitled to judgment as a matter of law. In support of this Motion, Defendant incorporates its Memorandum of Law, its Statement of Undisputed Material Facts, and the entire record in this case.

WHEREFORE, Defendant Bank of America, N.A. respectfully requests that the Court grant this Motion for Summary Judgment and for such other relief as may be appropriate

This 6th day of April, 2022.

/s/ Allison Rhadans

Allison Rhadans

Georgia Bar No. 940557

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FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

MADISON TITLE AGENCY, LLC	)	
	)	
Plaintiff,	)	CIVIL ACTION FILE
	)	NO. 1:20-cv-03674-SCJ
v.	)	
	)	REMOVED FROM
BANK OF AMERICA	)	SUPERIOR COURT
CORPORATION,	)	
	)	GWINNETT COUNTY CASE
	)	NO. 20-A-04652-7
Defendant.	)	
_____	)	

**CERTIFICATE OF SERVICE**

I hereby certify that on April 6, 2022, I served a true and correct copy of  
***Bank of America, N.A.'s Motion for Summary Judgment*** on the following via  
First-Class Mail, postage prepaid, addressed to:

George A. Koenig  
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/s/ Allison Rhadans

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